

**To:** Butterfield, W. Scott[W.S.Butterfield@WestonSolutions.com]  
**Cc:** Ackerman, Joyce[Ackerman.Joyce@epa.gov]  
**From:** Farris, Kristin  
**Sent:** Fri 12/19/2014 10:59:42 PM  
**Subject:** RE: START on-call coverage and support issues

Scott,

I appreciate you expediting the cost analysis for the GSA rentals. This was an important piece of the decision-making process for Craig and Steve in determining the way forward with the new warehouse facility. I realize that we gave you short notice, and did not actually specify a due date (which I wrongfully assumed we had included), so thank you for START's willingness to quickly compile the information regardless.

I also understand that Weston's One Call system does not identify specific individuals intended to respond to emergency calls. That said, it is disconcerting to the OSCs when they are given mixed messages as to who will respond and it appears as if Weston is scrambling to find available staff. If we are being charged on-call hours for specific individuals, the expectation is that those individuals have made themselves available that week, with obvious exceptions for illness, personal emergencies, etc. It is EPA's responsibility in reviewing invoices to validate labor hour expenses and we have no way of doing that without at least a tentative on-call schedule. If the third-party One Call system is Weston's preferred response method, we may be interested in negotiating a fixed price monthly rate for the service in lieu of a T&M structure. But this is definitely something we can discuss before issuing any new task orders.

With regard to the overall response program management, I am glad to hear that Weston has begun utilizing a new tracking system. Given that part of the intent of the Share Point project, though unsuccessful, was to develop this type of system, would it be possible for EPA personnel to somehow have access to this system? If not, is there a way to regularly generate a calendar to be shared with the OSCs? Since many of the deadlines specified via TDD rely on other tasks (e.g. "Draft report due 1 week after conclusion of sampling event" or "Final report due within 5 days of EPA review") it is understandable for there to be difficulty in tracking/managing specific deadlines. I think it would help all involved if there could be shared access to START's tracking system to ensure everyone is on the same page.

I understand that Dave Robinson is Weston's most experienced R1 in Region 8 and while I appreciate the intent behind catering to the preferences that may have been voiced by EPA personnel, I must ensure that EPA is in no way influencing Weston's internal personnel

decisions. Our concern is only with the quality of services received. How Weston chooses to address performance shortfalls is entirely up to Weston. That said, I wanted to provide you with a list of examples to demonstrate some of the issues that have sparked these concerns. (Please note that the status of these projects is current as of early this week. If deliverables have been submitted in the past 2 days, those updates are not reflected here.)

- 1307-05 Dalke's Laundry and Dry Cleaning (Ackerman) – The Sampling Report has never been submitted. All field work was completed in 2013 and the summer of 2014. The TDD expires 12/31/2014. The 85 percent report states “complete” yet the deliverable has never been submitted.

- 1405-11 Northern Cheyenne Asbestos Structures (Ackerman) – The Sampling Activities Report has never been submitted. The sampling was completed in July 2014. In addition, a trip report is due to document the removal action, but is not considered late at this time. The TDD expires 12/31/2014.

- 1407-02 Sugar House Plume Indoor Air (Ackerman) – The Sampling Activities Report has not been submitted. The sampling was completed by 10/1/2014. The TDD expires 1/31/2015.

- 1410-04 Grenora Dig (Myers) – A SAP/QAPP was due 10/25/2014. Despite e-mail reminders, it was never submitted. The sampling begins the week of 12/15/2014, but there is no SAP/QAPP. Additionally, this TDD (originally issued in July 2014) specifically allotted time to investigate proper GPS units to ensure what we bought would work with the EM31. START did not respond until September, at which point we had already ordered new GPS receivers. START has recently been working with our GPS units, receivers, and the EM31 to be ready for next week and realized we did not specify a specific data stream on the new receivers, so the new units do not have it and will never work with the EM31. We now have to rent one for this site, and since the EM31 is already on its way to MT, it will have to be connected there and hopefully able to work. While START is not entirely responsible for this mix-up, the risk associated with last-minute rentals and set up could have been avoided had START responded timely to the original request.

- 1407-07 Red River Supply Warehouse Fire (Peronard) – A final report is due 12/19/2014 (today). The TDD was specifically extended to this date at START's request to accommodate writing the final report. (This is not late, but included to be sure you are aware.)

- 1409-08 West Evans Pesticides (McComb) – Health & Safety Plan and QAPP/SAP were due 9/16/2014. On 10/7/2014, Dave Robinson told OSC Marty McComb that the materials

would be delivered imminently, but they were not.

- 1410-01 Stone Castle Recycling Assessment (Merritt) – The removal assessment report was due on 11/28/2014, but the OSC was forced to give the Project lead an additional three weeks to write the report. The draft report provided was of poor quality. All background information was directly copied from the OSC's write-up, with only little additional information added regarding on-site assessment activities. Specific elements in the scope of work were not addressed in the trip report.

Thanks in advance for your attention to these matters. Hopefully as we move into the winter months and field work slows down we can get these problems cleared up so we are back on track for the new season. Please keep me updated on Weston's progress in resolving these issues, and let me know your thoughts on a shared tracking system.

Sorry for the long-winded email on a Friday afternoon. I will be around Monday and Tuesday of next week if you would like to discuss any of this, so feel free to give me a call. Either way, I think it would be a good idea to catch up again in person after the New Year. Let me know what your schedule is like in the first couple weeks of January and we can set something up.

**Kristin Farris**

Contracting Officer

Environmental Protection Agency

Region 8, TMS-G

303-312-6126

**From:** Butterfield, W. Scott [mailto:W.S.Butterfield@WestonSolutions.com]

**Sent:** Friday, December 05, 2014 12:45 PM

**To:** Farris, Kristin  
**Cc:** Ackerman, Joyce  
**Subject:** FW: START on-call coverage and support issues

Kristin,

Dave Robinson is our most experienced R1 on the contract. We are in the process of transitioning him into a more managerial role but if you remember from our October meeting Joyce was opposed to having him be strictly non-technical on the contract. In order to better track deliverable and other deadlines for the removal, response and standby support functions of the contract we have set up a tracking system utilizing Primavera software. As TDDs are received due dates (if specified) will be entered to allow tracking on a weekly (or more frequent) basis. Due dates will be revised when appropriate when specified in TDD amendments. Reports from this system will be reviewed with the appropriate PTLs to ascertain if managerial action is required. In order to assess the success of this system I request that I be notified when due dates are missed so that I can take appropriate action. We have hired three junior staff and are in the process of training them to be R2s. We are also developing existing R2s to be R1s. This will help allow Dave to concentrate more on managerial duties.

In reference to yesterday's emergency response, the important thing is that we were able to respond. Also I am not aware of a situation where we could not respond to an ER. We have a "One Call" service where EPA calls our emergency response phone number and the service directs the call first to our R1 and if no response to our R2. If neither respond the call is directed to Dave Robinson. This is what happen yesterday. We are investigating why the call did not go through to the R1 and R2. Also appropriate adjustments will be made to this weeks on-call hours.

We do not specify to EPA who is on call at any one time. We do have an internal schedule which is updated on at least a monthly basis. We can share this with you if you like but it tends to be a "living" document since changes may be necessary to accommodate field schedules. Again, with our system the individual is not called directly by EPA.

Amendment A1 to TDD 0005/1404-07 GSA Vehicles CY 2 requested a new deliverable: cost analysis of GSA Vehicles vs. Leased vehicles per travel event. This amendment was issued on 26 November 2014 at 5:34 PM (the day before Thanksgiving). It does not specify a due date for this deliverable. In addition we were not given a heads up that it was coming. Dave and John

West completed and submitted the deliverable this morning.

Please do not hesitate to contact me if you would like to discuss further.

Thank you.

-Scott

W. Scott Butterfield, CHMM

Program Manager

Weston Solutions, Inc.

Suite 100

1435 Garrison Street

Lakewood, CO 80215

303.729.6113

720.557.0818 (cell)

**From:** Farris, Kristin [<mailto:Farris.Kristin@epa.gov>]

**Sent:** Thursday, December 04, 2014 5:22 PM

**To:** Butterfield, W. Scott

**Cc:** Ackerman, Joyce; Myers, Craig; Merritt, Steven; McComb, Martin

**Subject:** START on-call coverage and support issues

Scott,

When we last met in October, we discussed some of the management issues that have come up for the removal and response and standby support programs – deadlines slipping, missed deliverables, etc. EPA is not, and should not be, directly influencing any of Weston's personnel decisions, but you did indicate that you were planning to switch Dave Robinson into a purely management role to help rectify some of these issues. Since that does not seem to have happened, I wanted to follow up to ask how Weston is planning to address some of these management oversights. Just this week, for example, one of the START on-call staff was called upon to respond to a site and EPA was told he was unavailable and sent Dave Robinson in his place. This is not the first time this has happened. I expect EPA will not be billed for this person's on-call hours given they were unable to respond, but more importantly this presents a risk to EPA's mission if we are unable to rely on the START contractor to fulfill on-call duties as expected. Furthermore, Dave was working with Craig on a TDD to develop an urgently needed cost analysis regarding the GSA vehicles which was due tomorrow and I can only assume will now be delayed.

A few months back, we asked Weston to provide a monthly on-call schedule, but none of the response duty OSCs I have talked to have seen one recently. Please provide the latest on-call schedule to myself, Joyce, Marty, Craig, and Steve Merritt and let us know as soon as possible if changes become necessary.

Thank you,

**Kristin Farris**

Contracting Officer

Environmental Protection Agency

Region 8, TMS-G

303-312-6126

**CONFIDENTIALITY:** This email and attachments may contain information which is confidential and proprietary. Disclosure or use of any such confidential or proprietary information without the written permission of Weston Solutions, Inc. is strictly prohibited.

If you received this email in error, please notify the sender by return e-mail and delete this email from your system. Thank you.